

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

BRANDY BAKER,
Plaintiff,

v.

ALLERGAN, INC., et al.,
Defendant.

Civil Action No. 2:21-cv-13928

Hon. Brian A. Martinotti
Hon. Edward S. Kiel

**AFFIDAVIT OF JOSHUA M. MANKOFF, ESQUIRE, IN SUPPORT OF
MOTION TO WITHDRAW AS COUNSEL**

1. I, Joshua Mankoff, submit this declaration in support of Lopez McHugh's motion to withdraw from representation of Plaintiff in *Baker v. Allergan Inc., et al.*, No. 2:21-cv-13928.
2. I am an attorney at Lopez McHugh certified to practice in this Court, and I represent Plaintiff in his matter.
3. I am personally familiar with this case and the attempts made by myself and my office to communicate with Plaintiff.
4. This case was filed via direct-filing, short form complaint, on July 21, 2022.
5. My office has called Ms. Baker approximately 40 times in 2021 and 2022 attempting to gather information necessary to properly represent her.
6. My office has written to Ms. Baker via first class, electronic mail, and text message approximately 29 times in 2021 and 2022 attempting to gather

information necessary to properly represent her. Neither electronic nor first class mail were returned or rejected as undeliverable.

7. On September 7, 2022, my office conducted a paid public records search to attempt to determine if Plaintiff has changed her contact information without notifying us. The information returned indicates that Plaintiff has not moved or otherwise changed her contact information.
8. On September 8, 2022, my office sent a letter to Plaintiff via certified mail and electronic mail. We received delivery receipt of the electronic message, but not of the certified letter.
9. Despite the above efforts, Lopez McHugh has been unable to gather the requested information to date. Plaintiff has not notified Lopez McHugh about any updated contact information nor indicated that she has been unable to participate in her case because of any extraordinary circumstances that could constitute good cause.
10. My office has notified Plaintiff via certified, first class, and electronic mail of her obligation to provide the requested information and has informed her that we intend to withdraw as counsel if we do not hear from her.
11. My office has sent a copy of the motion to withdraw to Plaintiff's last known address.

12. Under penalty of perjury under the laws of the United States of America, I declare that each of the statements set forth above are true and correct to the best of my knowledge and belief.

Dated this 3rd day of November, 2022

/s/ Joshua Mankoff
Joshua M. Mankoff